

Steven J. Cohen (SC-1289)  
Wachtel & Masyr, LLP  
110 East 59<sup>th</sup> Street  
New York, NY 10022  
(212) 909-9500  
Attorneys for Defendant Beyond Electronics, Inc.  
d/b/a Beyond Cell

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

RESEARCH IN MOTION LIMITED,

Plaintiff,

-against-

BEYOND CELL INTERNATIONAL, INC., JOHN  
DOES 1-50, XYZ BUSINESS,

Defendants.

08 CV 03322 (TPG)

**MOTION TO ADMIT COUNSEL  
PRO HAC VICE**

PURSUANT TO RULE 1.3(c) of the Local Rules of the United States District  
Courts for the Southern District of New York, I, Steven J. Cohen, a member in good  
standing of the bar of this Court, hereby move for an Order on behalf of defendant  
allowing the admission *pro hac vice* of:

Applicant's Name: THOMAS I. ROZSA  
Firm Name: ROZSA LAW GROUP, LC  
Address: 18757 Burbank Boulevard, Suite 220  
City/State/Zip: Tarzana, California 91356-3346  
Phone Number: (818) 783-0990  
Fax Number: (818) 783-0992  
Email Address: [tom@rozsasalaw.com](mailto:tom@rozsasalaw.com)

Thomas I. Rozsa is a member in good standing of the Bar of the State of  
California. There are no pending disciplinary proceedings against Thomas I. Rozsa in  
any State or Federal Court.

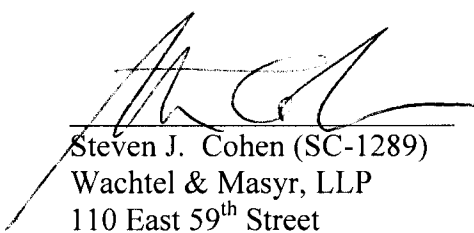
MAY 08 2008

92-525-650144

U.S. DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK  
2008 MAY 8 - 3 PM  
33

Dated: May 7, 2008  
New York, New York

Respectfully submitted,



Steven J. Cohen (SC-1289)

Wachtel & Masyr, LLP

110 East 59<sup>th</sup> Street

New York, NY 10022

Tel. (212) 909-9500

Fax (212) 909-9463

To: Martin N. Mutterperl, Esq.  
Fulbright & Jaworski, L.L.P.  
666 Fifth Avenue  
New York, New York 10103  
Attorneys for Plaintiff

Thomas I. Rozsa, Esq.  
Rozsa Law Group LC  
18757 Burbank Boulevard, Suite 220  
Tarzana, California 91356-3346

Steven J. Cohen (SC-1289)  
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UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

RESEARCH IN MOTION LIMITED,

Plaintiff,

-against-

BEYOND CELL INTERNATIONAL, INC., JOHN  
DOES 1-50, XYZ BUSINESS,

Defendants.

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**AFFIDAVIT OF STEVEN J.  
COHEN IN SUPPORT OF  
MOTION TO ADMIT COUNSEL  
PRO HAC VICE**

STEVEN J. COHEN, being duly sworn, hereby deposes and says as follows:

1. I am a member of Wachtel & Masyr LLP, counsel for defendant Beyond Electronics Inc., d/b/a Beyond Cell sued as “Beyond Cell International” (hereinafter “Beyond Cell”), in the above captioned action. I am familiar with the proceedings in this case. I make this affidavit based on my personal knowledge of the facts set forth herein and in support of Beyond Cell’s motion to admit Thomas I. Rozsa as counsel *pro hac vice* to represent Beyond Cell in this matter.

2. I am a member in good standing of the bar of the State of New York, and was admitted to practice law on February 7, 1983. I am also admitted to the bar of the United States District Court for the Southern District of New York, and am in good standing with this Court.

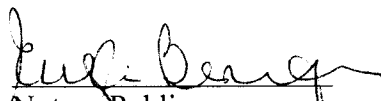
3. I have known Thomas I. Rozsa since 2005. A copy of the Certificate of Good Standing for Mr. Rozsa for the State Bar of California and United States District Court for the Central District of California is attached.


4. Mr. Rozsa is a member of the Rozsa Law Group LC, in Tarzana, California.

5. I have found Mr. Rozsa to be a skilled attorney and a person of integrity. He is experienced in federal practice and is familiar with the Federal Rules of Civil Procedure.

WHEREFORE, Defendant respectfully requests that the Court grant Beyond Cell's motion and enter an Order granting the admission of Thomas I. Rozsa, *pro hac vice*, substantially in the form attached hereto as Exhibit A.

Sworn to me this 7<sup>th</sup> day  
of May 2008

  
Notary Public

  
Steven J. Cohen (SJC-1289)

EUGENIA BENETOS  
NOTARY PUBLIC-STATE OF NEW YORK  
No. 01BE6130813  
Qualified in Queens County  
My Commission Expires July 25, 2009



# THE STATE BAR OF CALIFORNIA

MEMBER SERVICES CENTER

180 HOWARD STREET, SAN FRANCISCO, CALIFORNIA 94105-1639

TELEPHONE: 888-800-3400

May 2, 2008

TO WHOM IT MAY CONCERN:

This is to certify that according to the records of the State Bar, THOMAS IGOR ROZSA, #080615 was admitted to the practice of law in this state by the Supreme Court of California on June 23, 1978; and has been since that date, and is at date hereof, an ACTIVE member of the State Bar of California; and that no recommendation for discipline for professional or other misconduct has ever been made by the Board of Governors or a Disciplinary Board to the Supreme Court of the State of California.

THE STATE BAR OF CALIFORNIA

A handwritten signature in black ink, appearing to read "Kath Lambert".

Kath Lambert  
Custodian of Membership Records

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# United States District Court

Central District of California

## CERTIFICATE OF GOOD STANDING

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I, SHERRI R. CARTER, Clerk of this Court, certify that

Thomas I. Rozsa, Bar No. 80615

was duly admitted to practice in this Court on August 17, 1978

and is in good standing as a member of the Bar of this Court.

Dated at Los Angeles, California.

on May 1, 2008  
DATE

SHERRI R. CARTER, CLERK

By

  
Lupe Throner  
Lupe Throner, Deputy Clerk

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

RESEARCH IN MOTION LIMITED,

Plaintiff,

-against-

BEYOND CELL INTERNATIONAL, INC., JOHN  
DOES 1-50, XYZ BUSINESS,

Defendants.

08 CV 03322 (TPG)

**ORDER FOR ADMISSION  
PRO HAC VICE  
ON WRITTEN MOTION**

Upon the motion of Steven J. Cohen, attorney for Defendant Beyond Cell International, Inc. and said sponsor attorney's affidavit in support;

**IT IS HEREBY ORDERED** that:

Applicant's Name: THOMAS I. ROZSA  
Firm Name: ROZSA LAW GROUP, LC  
Address: 18757 Burbank Boulevard, Suite 220  
City/State/Zip: Tarzana, California 91356-3346  
Phone Number: (818) 783-0990  
Fax Number: (818) 783-0992  
Email Address: [tom@rozsasalaw.com](mailto:tom@rozsasalaw.com)

is admitted to practice *pro hac vice* as counsel for Defendant Beyond Electronics, Inc. d/b/a Beyond Cell, sued as "Beyond Cell International" in the above captioned case in the United States District Court for the Southern District of New York. All attorneys appearing before this Court are subject to the Local Rules of this Court, including the Rules governing discipline for attorneys. Mr. Rozsa shall immediately apply for an ECF password at [www.nysd.uscourts.gov](http://www.nysd.uscourts.gov). Counsel shall forward the *pro hac vice* fee to the Clerk of the Court.

Dated: May \_\_, 2008  
New York, New York

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**U.S.D.J.**

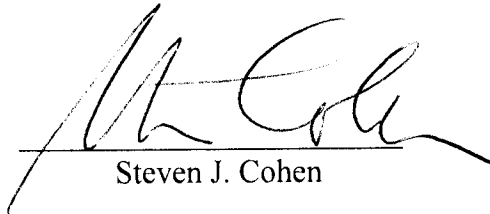
**CERTIFICATE OF SERVICE**

I, Steven J. Cohen, attorney for defendant Beyond Cell Electronics, Inc. d/b/a Beyond Cell, hereby certify that a true and correct copy of the attached Motion to Admit Counsel Pro Hac Vice was served by first class mail on May 7, 2008, upon the following parties:

Martin N. Mutterperl, Esq.  
Fulbright & Jaworski, L.L.P.  
666 Fifth Avenue  
New York, New York 10103  
Attorneys for Plaintiff

Thomas I. Rozsa, Esq.  
Rozsa Law Group LC  
18757 Burbank Boulevard, Suite 220  
Tarzana, California 91356-3346

Dated: New York, New York  
May 7, 2008



Steven J. Cohen